

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

ZHU ZHAI HOLDINGS LIMITED and
PETER PUI TAK LEE,

Plaintiffs,

v.

STEVEN IVANKOVICH,

Defendant.

Case No. 1:20-cv-4985

Hon. Sharon Johnson Coleman

MOTION TO WITHDRAW AS COUNSEL

Daryl M. Schumacher (“Movant”), hereby moves for entry on an Order granting him leave to withdraw as counsel of record for Defendant Steven Ivankovich (“Defendant”). In support of this motion, Movant states as follows:

1. Plaintiff Zhu Zhai Holdings Limited (“Zhu”) and Peter Pui Tak Lee (“Lee”) initiated this action on or about August 24, 2020.
2. Movant appeared for Defendant on November 27, 2020, and filed an answer for Defendant on December 22, 2020.
3. While fact discovery closes on May 28, 2021, this case has not yet been set for trial.
4. Rule 1.16(b)(1) of the Illinois Rules of Professional Conduct provides that a lawyer may withdraw from representing a client if “withdrawal can be accomplished without material adverse effect on the interests of the client.”
5. Rule 1.16(b)(5)-(6) also provide that a lawyer may withdraw from representing a client where the client fails to substantially fulfill an obligation to the lawyer regarding the lawyer’s services and has been given warning that the lawyer will withdraw unless the obligation

is fulfilled; and where the representation will result in an unreasonable financial burden on the lawyer.

6. Here, all three subsections of Rule 1.16 are present. Under the circumstances, withdrawal of Movant would not have a material adverse effect on the interest of Defendant and is thus appropriate under Rule 1.16(b)(1). Defendant has sufficient time to hire substitute counsel and substitute counsel has sufficient time to get up to speed on this case.

7. In view of the foregoing, Movant respectfully requests that he be authorized by Order of this Court to withdraw as counsel of record for Defendant.

8. A completed Notification of Party Contact Information is attached as Exhibit A.

WHEREFORE, Daryl M. Schumacher, attorney appearing in this action, respectfully requests that this Court grant Movant leave to withdraw his appearance in the captioned case.

Date May 10, 2021

Respectfully submitted,

By: /s/ Daryl M. Schumacher

Daryl M. Schumacher (#6244815)
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120 North LaSalle Suite 2000
Chicago, IL 60602
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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he caused true and correct copies of the foregoing document to be served upon all counsel of record via the ECF filing system on May 10, 2021, and served Defendant Steven Ivankovich via email and U.S. Mail on May 10, 2021.

/s/ Daryl M. Schumacher

EXHIBIT A

06/12/15

**United States District Court
Northern District of Illinois**

Notification of Party Contact Information

Directions: This form must be attached to a motion to withdraw from a case when no other attorney of record has been noted on the docket. A completed form must be electronically filed as an attachment to the motion to withdraw. The address and telephone number of your client must be completed on this form to enable the Court to contact your client in the future if the motion to withdraw is granted.

Case Number: 1:20-cv-4985

Case Title: Zhu Zhai Holdings, Ltd. v. Ivankovich

Judge: Hon. Sharon Johnson Coleman

Name of Attorney submitting the motion to withdraw:

Daryl M. Schumacher

Name of Client:

Steven Ivankovich

Mailing address of Client: 235 W. Menomenee St.

City: Chicago

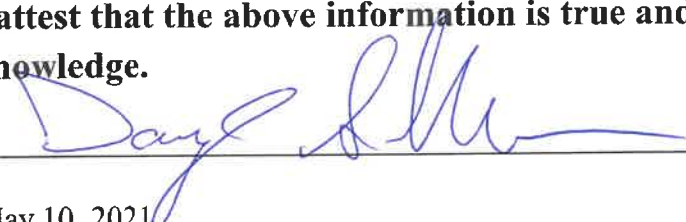
State: IL

Zip: 60614

Telephone Number: (312) 315-4826

I attest that the above information is true and correct to the best of my knowledge.

Signed:



Date: May 10, 2021